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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PENDLETON DIVISION

OREGON FIREARMS FEDERATION, INC.,
et al.,

Plaintiffs,

v.

TINA KOTEK, et al.,

Defendants,

and

Case No. 2:22-cv-01815-IM (lead case)
3:22-cv-01859-IM (trailing case)
3:22-cv-01862-IM (trailing case)
3:22-cv-01869-IM (trailing case)

JOINT STATUS REPORT

OREGON ALLIANCE FOR GUN SAFETY,	
	Intervenor-Defendant.
<hr/>	
MARK FITZ, et al.,	
	Plaintiffs,
v.	
ELLEN F. ROSENBLUM, et al.,	
	Defendants.
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KATERINA B. EYRE, et al.,	
	Plaintiffs,
v.	
ELLEN F. ROSENBLUM, et al.,	
	Defendants,
and	
OREGON ALLIANCE FOR GUN SAFETY,	
	Intervenor-Defendant.
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DANIEL AZZOPARDI, et al.,	
	Plaintiffs,
v.	
ELLEN F. ROSENBLUM, et al.,	
	Defendants.

Counsel for the parties conferred by telephone and email and have agreed upon the following case schedule:

1. Initial Disclosures: The parties agree to waive initial disclosures as otherwise required by FRCP 26(a)(1)(A).

2. Defendants' Answers: Defendants will file answers to plaintiffs' complaints by **March 3**.
3. Disclosure of Additional Experts: The parties agree to treat the declarations filed with the briefing on the motions for preliminary injunction (ECF Nos. 72-76, 79-80, 109, 111, 116, 118-125, 129) as expert disclosures and witness statements. The parties shall disclose any additional expert reports no later than **March 8**.
4. Disclosure of rebuttal experts to additional experts: The parties will disclose rebuttal expert reports by **March 20**.
5. Service of written fact discovery: The parties will serve each other with all written discovery requests by **March 13**. Per FRCP 33(b)(2), 34(b)(2)(A), and 36(a)(3), responses to all written requests will be due no later than **April 14**.
6. Expert depositions: All expert depositions will be limited to three hours and will take place between **March 13** and **April 7**. The parties shall not retake any depositions of experts who have already been deposed, excepting any experts who have filed amended, corrected, or updated declarations following their depositions. The parties may retake fact witness depositions during the period for fact witness depositions.
7. Fact depositions: All fact-witness depositions will be limited to three hours and will take place between **April 17** and **May 5**.
8. Discovery motions: Discovery motions (other than discovery motions arising from fact witness depositions) shall be filed no later than **May 5**. Responses shall be filed by **May 12**.
9. Amended pleadings: Amended pleadings are due **May 8**.

10. Dispositive motions: Dispositive motions are due by **May 12**, with responses due by **May 22** and replies on **May 26**. The parties agree that any party may file a motion prior to May 12, and any response to that motion will be due **14 days** after that filing.

11. Trial brief: The parties will submit their respective trial briefs by **May 15**.

12. Pretrial motions, witness statements, and exhibit lists: Motions *in limine*, *Daubert* motions, fact witness statements, and exhibit lists shall be filed by **May 15**. Responses to motions *in limine* and *Daubert* motions and objections to exhibits and witness statements shall be filed by **May 22**.

13. Pretrial conference: The parties propose holding a half-day pretrial conference on **May 30**. The parties have stipulated that plaintiffs will present one witness during the pretrial conference, to accommodate that witness's unavailability during the agreed-upon trial setting. The witness will be subject to direct and cross examination, and the witness's testimony will be designated as part of the trial record.

14. Trial (5 days): The parties are available for a five-day bench trial during the week of **June 5-9**.

In sum, the parties' proposed case deadlines are as follows.

Event	Parties' Proposed Date
Defendants' Answers	March 3
Disclosure of Experts	March 8
Service of Written Fact Discovery	March 13
Disclosure of Rebuttal Experts	March 20
Expert Depositions	March 13-April 7
Responses to Written Fact Discovery	April 14

Fact Witness Depositions	April 17-May 5
Discovery Motions	May 5
Amended Pleadings	May 8
Responses to Discovery Motions	May 12
Dispositive Motions (e.g. Motion for Judgment on the Pleadings, MSJ)	May 12
Trial Briefs	May 15
Pretrial Motions, Witness Statements, Exhibit Lists	May 15
Responses to Pretrial Motions, and Objections to Witness Statements and Exhibit Lists	May 22
Responses to Dispositive Motions	May 22
Replies to Dispositive Motions	May 26
Pretrial Conference	May 30
Trial	June 5-9

DATED this 27th day of February, 2023.

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s/ Leonard W. Williamson

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ECF CERTIFICATION

The filing attorney attests that he has obtained concurrence regarding the filing of this document from plaintiffs' counsel signatories to this document.

Date: February 27, 2023

s/ Hannah K. Hoffman

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